

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHNNY B. DELASHAW, JR.,

Plaintiff,

v.

SEATTLE TIMES COMPANY, and
CHARLES COBBS,

Defendants.

CASE NO. 2:18-cv-00537-JLR

DECLARATION OF MICHELE
MATASSA FLORES IN SUPPORT OF
THE SEATTLE TIMES' SECOND
MOTION FOR SUMMARY JUDGMENT

**NOTED ON MOTION CALENDAR:
July 31, 2020**

I, Michele Matassa Flores, hereby declare:

1. I am the Executive Editor of The Seattle Times and I make this declaration based on personal knowledge.

2. The Seattle Times took the very unusual step of publishing Dr. Delashaw's written statement in full on our website. In addition, the article about financial incentives for SNI surgeons was reworked at the very last minute, when we finally received Dr. Delashaw's written statement. In addition to publishing his statement in full on our website, we included responsive portions of his statement throughout that article.

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1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct.

3 EXECUTED in Seattle, Washington this 8th day of July, 2020.

4
5 
6 Michele Matassa Flores